

TO: Mail Stop 8 Director of the U.S. Patent and Trademark Office P.O. Box 1450 Alexandria, VA 22313-1450	REPORT ON THE FILING OR DETERMINATION OF AN ACTION REGARDING A PATENT OR TRADEMARK
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In Compliance with 35 U.S.C. § 290 and/or 15 U.S.C. § 1116 you are hereby advised that a court action has been
 filed in the U.S. District Court Northern District of California on the following ☒ Patents or ☒ Trademarks:

DOCKET NO.	DATE FILED 7/12/2011	U.S. DISTRICT COURT Northern District of California
PLAINTIFF Innovative Automation LLC		DEFENDANT Mediatechnics Systems, Inc.; Tibi Szilagya; Coptech Digital, Inc.
PATENT OR TRADEMARK NO.	DATE OF PATENT OR TRADEMARK	HOLDER OF PATENT OR TRADEMARK
1 7,174,362	2/6/2007	Innovative Automation LLC
2		
3		
4		
5		

In the above—entitled case, the following patent(s)/ trademark(s) have been included:

DATE INCLUDED	INCLUDED BY			
	<input checked="" type="checkbox"/> Amendment	<input checked="" type="checkbox"/> Answer	<input checked="" type="checkbox"/> Cross Bill	<input checked="" type="checkbox"/> Other Pleading
PATENT OR TRADEMARK NO.	DATE OF PATENT OR TRADEMARK	HOLDER OF PATENT OR TRADEMARK		
1				
2				
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In the above—entitled case, the following decision has been rendered or judgement issued:

DECISION/JUDGEMENT

CLERK	(BY) DEPUTY CLERK	DATE
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Copy 1—Upon initiation of action, mail this copy to Director Copy 3—Upon termination of action, mail this copy to Director
 Copy 2—Upon filing document adding patent(s), mail this copy to Director Copy 4—Case file copy

FAKED
 FIRST LEGAL SUPPORT SERVICES

ORIGINAL

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

INNOVATIVE AUTOMATION LLC,
Plaintiff,

v.

MEDIATECHNICS SYSTEMS, INC.;
TIBI SZILAGYA, an individual;
COPTECH DIGITAL, INC.,

Defendants.

Case No.

**COMPLAINT FOR PATENT
INFRINGEMENT**

DEMAND FOR JURY TRIAL

Date: July 12, 2011

FILED
2011 JUL 12 P 3:36
RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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CV 11 3410

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Complaint for Patent Infringement

1 Plaintiff Innovative Automation LLC states its complaint against Defendants
2 Mediatechnics Systems, Inc., Tibi Szilagya, and Coptech Digital, Inc., and alleges as
3 follows:
4

5 **THE PARTIES**

6 1. Plaintiff Innovative Automation LLC ("Plaintiff" or "Innovative Automation")
7 is a limited liability company organized and existing under the laws of the State of
8 California, with its principal place of business at 606 North First Street, San Jose, California
9 95112.

10 2. On information and belief, Defendant Mediatechnics Systems, Inc.
11 ("Mediatechnics") is a corporation that, during at least part of the relevant period, was
12 organized and existing under the laws of the State of California, with its principal place of
13 business at 4 Bluehill Court, Scotts Valley, California 95066. On information and belief,
14 one or more individuals continue to operate the business of Mediatechnics, and to sell
15 products under the Mediatechnics name, although the corporate status of Mediatechnics has
16 been suspended.

17 3. On information and belief, Defendant Tibi Szilagya is an individual residing at
18 4 Bluehill Court, Scotts Valley, California 95066. On information and belief, Mr. Szilagya
19 has directed the operations of Mediatechnics during the entirety of the relevant period—both
20 before and after Mediatechnics' corporate status was suspended.

21 4. On information and belief, Defendant Coptech Digital, Inc. ("Coptech") is a
22 corporation organized and existing under the laws of the Commonwealth of Massachusetts,
23 with its principal place of business at 100 Cummings Park, Woburn, Massachusetts 01801.

24 **JURISDICTION AND VENUE**

25 5. Plaintiff realleges and incorporates by reference paragraphs the above
26 paragraphs of this Complaint, inclusive, as though fully set forth herein.
27
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1 6. This action is for patent infringement pursuant to the patent laws of the United
2 States, 35 U.S.C. §§ 1 *et seq.* This Court has subject matter jurisdiction over the action
3 pursuant to 28 U.S.C. §§ 1331 and 1338(a).

4 7. This Court has personal jurisdiction over Defendant Mediatechnics Systems,
5 Inc. because, on information and belief, Mediatechnics does and has done substantial
6 business in this judicial District, including (i) maintaining its principal place of business in
7 this judicial District; (ii) committing acts of patent infringement and/or contributing to or
8 inducing acts of patent infringement by others in this judicial District and elsewhere in
9 California; and (iii) regularly doing business or soliciting business, engaging in other
10 persistent courses of conduct, and/or deriving substantial revenue from products and/or
11 services provided to persons in this District and in this State.

12 8. This Court has personal jurisdiction over Defendant Tibi Szilagya because, on
13 information and belief, Mr. Szilagya resides in this judicial District, and because Mr.
14 Szilagya does and has done substantial business in this judicial District, including (i)
15 directing the operations of Mediatechnics Systems, Inc., which maintained and maintains its
16 principal place of business in this judicial District; (ii) committing acts of patent
17 infringement and/or contributing to or inducing acts of patent infringement by others in this
18 judicial District and elsewhere in California; and (iii) regularly doing business or soliciting
19 business, engaging in other persistent courses of conduct, and/or deriving substantial
20 revenue from products and/or services provided to persons in this District and in this State.

21 9. This Court has personal jurisdiction over Defendant Coptech Digital, Inc.
22 because, on information and belief, Coptech does and has done substantial business in this
23 judicial District, including (i) committing acts of patent infringement and/or contributing to
24 or inducing acts of patent infringement by others in this judicial District and elsewhere in
25 California; (ii) making significant purchases of infringing products in this judicial District;
26 and (iii) regularly doing business or soliciting business, engaging in other persistent courses
27
28

1 of conduct, and/or deriving substantial revenue from products and/or services provided to
2 persons in this District and in this State.

3 10. Venue is proper in this judicial District pursuant to 28 U.S.C. §§ 1391 and
4 1400(b) because, on information and belief, the Defendants have committed acts of direct
5 and indirect infringement in this judicial District and have transacted business in this judicial
6 District. In addition, Defendant Mediatechnics has its headquarters and/or facilities in this
7 judicial District, and Defendant Szilagya resides in this judicial District.

8 **CLAIM FOR RELIEF**

9 **(Infringement of United States Patent No. 7,174,362)**

10 11. Plaintiff realleges and incorporates by reference paragraphs the above
11 paragraphs of this Complaint, inclusive, as though fully set forth herein.

12 12. Plaintiff is the owner of all right, title, and interest in United States Patent No.
13 7,174,362, entitled "Method and System for Supplying Products from Pre-Stored Digital
14 Data in Response to Demands Transmitted via Computer Network," duly and legally issued
15 by the United States Patent and Trademark Office on February 6, 2007 (the "'362 patent").
16 A true and correct copy of the '362 patent is attached hereto as Exhibit A.

17 13. The '362 patent generally describes and claims a computer-implemented
18 method of digital data duplication. In the method of claim 1 of the '362 patent, a request is
19 taken at one or more user interfaces and is transmitted through a network to a computer.
20 The computer contains a module to create a task log based on incoming requests; a module
21 for storing the necessary data; and a module to create a subset of the data, download that
22 subset to an output device, and command the device to transfer the subset onto blank media.
23 The request is assigned to an output device, and the duplication process is executed. Claims
24 2-8 of the '362 patent describe various other methods and a system of digital data
25 duplication.

26 14. On information and belief, Mediatechnics Systems, Inc. has contributorily
27 infringed and continues to contributorily infringe one or more claims of the '362 patent,
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1 literally and/or under the doctrine of equivalents, by making, offering to sell, and selling
2 devices that (1) constitute a material part of the invention of the '362 patent, (2)
3 Mediatechnics knows to be especially adapted for use in infringing the '362 patent, and (3)
4 are not staple articles of commerce suitable for substantial noninfringing use with respect to
5 the '362 patent. These devices include at least the Mediatechnics Fusion KVM, and are
6 used by companies, such as those that offer digital media duplication services, in a way that
7 directly infringes one or more claims of the '362 patent. In addition, Mediatechnics has
8 directly infringed, and continues to directly infringe, literally and/or under the doctrine of
9 equivalents, one or more claims of the '362 patent under 35 U.S.C. § 271 by using the
10 claimed method(s) of duplicating digital data while (i) testing these devices; and (ii) using
11 these devices to perform digital media duplication services such as optical media duplication
12 services.

13 15. On information and belief, Tibi Szilagya has contributorily infringed and
14 continues to contributorily infringe one or more claims of the '362 patent, literally and/or
15 under the doctrine of equivalents, by making, offering to sell, and selling devices that (1)
16 constitute a material part of the invention of the '362 patent, (2) Mr. Szilagya knows to be
17 especially adapted for use in infringing the '362 patent, and (3) are not staple articles of
18 commerce suitable for substantial noninfringing use with respect to the '362 patent. These
19 devices include at least the Mediatechnics Fusion KVM, and are used by companies, such as
20 those that offer digital media duplication services, in a way that directly infringes one or
21 more claims of the '362 patent. In addition, Mr. Szilagya has directly infringed, and
22 continues to directly infringe, literally and/or under the doctrine of equivalents, one or more
23 claims of the '362 patent under 35 U.S.C. § 271 by using the claimed method(s) of
24 duplicating digital data while (i) testing these devices; and (ii) using these devices to
25 perform digital media duplication services such as optical media duplication services.

26 16. Defendant Coptech Digital, Inc. has infringed, and continues to infringe,
27 literally and/or under the doctrine of equivalents, one or more claims of the '362 patent
28

1 under 35 U.S.C. § 271 by using the claimed method(s) of duplicating digital data while
2 performing digital media duplication services such as its optical media duplication services.

3 17. As a result of each Defendant's infringing activities, Plaintiff has suffered
4 damages in an amount not yet ascertained. Plaintiff is entitled to recover damages adequate
5 to compensate it for each Defendant's infringing activities in an amount to be determined at
6 trial, but in no event less than reasonable royalties, together with interest and costs.

7 18. Plaintiff reserves the right to allege, after discovery, that each Defendant's
8 infringement is willful and deliberate, entitling Plaintiff to increased damages under 35
9 U.S.C. § 284, and to attorneys' fees incurred in prosecuting this action under 35 U.S.C. §
10 285.

11 **PRAYER FOR RELIEF**

12 WHEREFORE, Plaintiff requests entry of judgment in its favor against each
13 Defendant as follows:

- 14 a) For a declaration that each Defendant has infringed, directly and/or
15 indirectly, the '362 patent;
- 16 b) For an award of damages adequate to compensate Plaintiff for each
17 Defendant's infringement of the '362 patent, but in no event less than a reasonable royalty,
18 together with prejudgment and post-judgment interest and costs, in an amount according to
19 proof;
- 20 c) For an entry of a permanent injunction enjoining each Defendant, and its
21 respective officers, agents, employees, and those acting in privity, from further
22 infringement, including contributory infringement and/or inducing infringement, of the '362
23 patent, or in the alternative, awarding a royalty for post-judgment infringement;
- 24 d) For an award of attorneys' fees pursuant to 35 U.S.C. § 285 or as otherwise
25 permitted by law; and
- 26 e) For an award to Plaintiff of such other costs and further relief as the Court
27 may deem just and proper.
28


DEMAND FOR JURY TRIAL

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, Plaintiff respectfully requests a trial by jury.

Respectfully submitted,

Dated: July 12, 2011

GUTRIDE SAFIER LLP



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Attorneys for Plaintiff Innovative
Automation LLC

JS 44 (Rev. 12/07) (CAND Rev 1/10)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON PAGE TWO OF THE FORM.)

I. (a) PLAINTIFFS

INNOVATIVE AUTOMATION LLC

DEFENDANTSMEDIATECHNICS SYSTEMS, INC.; TIBI SZILAGYA;
COPTech DIGITAL, INC.(b) County of Residence of First Listed Plaintiff Santa Clara County
(EXCEPT IN U.S. PLAINTIFF CASES)County of Residence of First Listed Defendant
(IN U.S. PLAINTIFF CASES ONLY)
NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE
LAND INVOLVED.

(c) Attorney's (Firm Name, Address, and Telephone Number)

Attorneys (If Known)

TODD KENNEDY (State Bar No. 250267)
GUTRIDE SAFIER LLP
835 Douglass Street
San Francisco, California 94114 (415) 789-6390**II. BASIS OF JURISDICTION** (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business in This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business in Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General Habeas Corpus <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus - Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights			

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from another district (specify) ☐ 6 Multidistrict Litigation ☐ 7 Appeal to District Judge from Magistrate Judgment

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

35 U.S.C. § 271

Brief description of cause:

Patent Infringement

VII. REQUESTED IN COMPLAINT:☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 DEMAND \$ unknownCHECK YES only if demanded in complaint:
JURY DEMAND: ☒ Yes ☐ No**VIII. RELATED CASE(S) IF ANY**

PLEASE REFER TO CIVIL L.R. 3-12 CONCERNING REQUIREMENT TO FILE

"NOTICE OF RELATED CASE". See Notice of Related Cases, filed concurrently.

IX. DIVISIONAL ASSIGNMENT (CIVIL L.R. 3-2) (PLACE AND "X" IN ONE BOX ONLY)☒ SAN FRANCISCO/OAKLAND ☐ SAN JOSE ☐ EUREKA

DATE

July 12, 2011

SIGNATURE OF ATTORNEY OF RECORD

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